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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 ALBERT COLLINS,
17 Defendant.

Case No. 3:21-cr-00463-VC-1

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE MTD HEARING**

Dept.: Courtroom 4 – 17th Floor

Judge: Hon. Vince Chhabria

Date Filed: October 2, 2024

1 Defendant Albert Collins (“Mr. Collins”) and the United States of America (“United
2 States” or “the government”) (collectively, the “parties”) hereby stipulate and agree as follows:

3 WHEREAS the United States filed a motion to dismiss a Form 12 on October 2, 2024,
4 Dkt. 86;

5 WHEREAS Mr. Collins filed a response to the government’s motion to dismiss on
6 November 6, 2024, Dkt. 90;

7 WHEREAS a hearing on the government’s motion to dismiss is currently scheduled for
8 November 13, 2024 at 1:00 p.m., Dkt. 89;

9 WHEREAS the parties understand that Mr. Collins was recently taken into state custody
10 in connection with an unrelated criminal case filed in the Superior Court of California for the
11 County of Alameda;

12 WHEREAS counsel for Mr. Collins desires additional time to confer with Mr. Collins and
13 investigate his circumstances;

14 WHEREAS the parties understand the U.S. Marshals Service will need additional time to
15 ensure Mr. Collins’ presence at the motion-to-dismiss hearing in the event that Mr. Collins
16 remains in state custody;

17 WHEREAS the parties agree to continue the hearing on the government’s motion to
18 dismiss to December 11, 2024; and

19 WHEREAS the Court’s calendar indicates that it is available on December 11, 2024;

20 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties that

21 1. The November 13, 2024 hearing on the government’s motion to dismiss shall be
22 re-set for December 11, 2024, or a date thereafter at the Court’s convenience.

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1 Dated: November 7, 2024

ISMAIL J. RAMSEY
United States Attorney

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3 By: /s/ Christine Chen
4 CHRISTINE CHEN
5 Special Assistant United States Attorney
6 Attorney for the United States

7 Dated: November 7, 2024

KEKER, VAN NEST & PETERS LLP

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9 By: /s/ Cody Gray
10 CODY GRAY
11 Attorney for Defendant
12 Albert Collins

13 **CONCURRENCE**

14 I, Cody Gray, am the user whose ID and password are being used to file this
15 STIPULATION AND [PROPOSED] ORDER TO CONTINUE MTD HEARING. I hereby attest
16 that each of the signatories has concurred in the filing of this document and has authorized the use
17 of his or her electronic signature.

18 Dated: November 7, 2024

19 By: /s/ Cody Gray

[PROPOSED] ORDER

THE FOREGOING STIPULATION IS APPROVED AND SO ORDERED.

Dated:

By:

HON. VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE